

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RAYMOND JONNA, SIMON JONNA, and
FARID JAMARDOV,

Plaintiffs,

CASE NO.: 22-CV-10208

v.

GIBF GP, Inc. d/b/a BITCOIN LATINUM,
and KEVIN JONNA,

Hon. Laurie J. Michelson
Mag. Jonathan J.C. Grey

Defendants.

MOTION TO WITHDRAW AS COUNSEL BY BRIAN K. MITZEL

Brian K. Mitzel, one of the attorneys of record for Defendant Kevin Jonna, hereby seeks an order permitting the withdrawal of Brian K. Mitzel in this matter. Pursuant to LR 83.25, an “attorney’s appearance continues until entry of . . . a withdrawal or substitution order.” The reason for this request is that Defendant has failed to fulfill obligations to Mr. Mitzel and Dinsmore & Shohl, despite warning. Further, Mr. Mitzel is no longer associated with Dinsmore & Shohl or any other law firm at this time.

Pursuant to Michigan Rule of Professional Conduct 1.16(b)(4), withdrawal may occur if “the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled[.]” To date, Defendant Kevin

Jonna has failed to fulfill obligations to Brian K. Mitzel and Dinsmore & Shohl, despite warning from Mr. Mitzel that he would withdraw as counsel if the obligations were not fulfilled.

Accordingly, Brian K. Mitzel asks that this Court enter an order permitting Mr. Mitzel to withdraw from this case. Mr. Mitzel also asks that this Court stay proceedings for 30 days so that Defendant Kevin Jonna can obtain successor counsel.

Respectfully submitted by,

/s/ Brian K. Mitzel
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Dated: May 29, 2024

CERTIFICATION OF SERVICE

I hereby certify that on May 29, 2024, I e-filed through the CM/ECF system the above document(s) and this Certificate of Service to counsel of record.

/s/Brian K. Mitzel
Brian K. Mitzel